

Installation Restoration Program

# Final Statement of Basis for Site DP-84, Jack Lake Limb Disposal Area, Eglin Air Force Base



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## Objective

This Statement of Basis (SB) explains the proposed remedy for Site DP-84, the Jack Lake Limb Disposal Area, designated in the U.S. Environmental Protection Agency (EPA) Resource Conservation and Recovery Act (RCRA) Hazardous and Solid Waste Act (HSWA) Permit (the Permit) for Eglin Air Force Base (AFB) as a Solid Waste Management Unit (SWMU). The site is located on Eglin Air Force Base (AFB) and managed under the Air Force Installation Restoration Program (IRP). A RCRA Facility Investigation (RFI) and Interim Corrective Measure (ICM) were conducted at Site DP-84 from October 1997 through February 1999. Based on the results of the RFI and ICM, No Further Investigative Action coupled with Land Use Controls (LUCs) is recommended for Site DP-84. The LUCs restrict future residential development of the site. This remedy will protect human health. To implement the LUCs, a Land Use Controls Implementation Plan (LUCIP) will be developed by the Air Force for this site. The LUCIP will be approved by EPA and will also serve as the Corrective Measures Implementation Plan (CMIP), as required to implement a remedy, pursuant to RCRA.

The public is invited to comment on this proposed remedy for Site DP-84 or any other remedial alternatives, including those not previously identified. This SB includes information on how the public may participate in this decision making process.

## Introduction

Site DP-84 is identified in the Permit for Eglin AFB, issued by EPA Region 4, effective September 16, 1986, and reissued April 26, 1998. This SWMU is regulated under the Permit, which requires that SWMUs be investigated, remediated, and closed. The Permit requires that an SB be prepared which identifies the proposed remedy for the disposal area, explains the rationale for the remedy selection, and allows for a Public Comment Period of 45 days.

EPA Region 4 will finalize this decision by modifying the Permit to incorporate the corrective measure, subsequent to Florida Department of Environmental Protection (FDEP) review of, and concurrence with, this SB, and the public comment period has ended. All information submitted during this time frame will be reviewed and considered before Draft approval. Eglin AFB, EPA, and FDEP have entered into a memorandum of agreement (MOA) which outlines the LUCs as described in the EPA Region 4 Memorandum, *Assuring Land Use Controls at Federal Facilities*, dated April 21, 1998. This MOA serves as the LUC Assurance Plan (LUCAP). A LUCIP will be developed by the Air Force IRP and will serve as the CMIP. The LUCIP will be implemented in accordance with EPA Policy.

This SB provides a summary of past investigative work performed at Site DP-84; however, this SB should not be considered a substitute for the actual technical documents. In addition to the information provided in this SB, more detailed information is provided in the *RCRA Facility Investigation/Interim Corrective Measures (RFI/ICM) Report for Site DP-84, Eglin AFB* (CH2M HILL, 1999). The MOA, the EPA Region 4 Memorandum and other documents related to Site DP-84 can be found in the Eglin AFB Administrative Record, which is available for public review (see the last section of this SB for locations).

## Background/History of Site DP-84

Eglin AFB is located within the Eglin Military Reservation in the Florida Panhandle. The Eglin Military Reservation comprises an area of approximately 740 square miles and includes portions of Okaloosa, Walton, and Santa Rosa counties. Site DP-84 is located in Okaloosa County, Florida, on Eglin Main Base, approximately 2 miles northeast of Shalimar, Florida (Figure 1).

The Jack Lake Limb Disposal area was identified in June 1991 as a potential source of environmental contamination associated with past unmonitored dumping. A Preliminary Assessment (PA) of the site was conducted in 1994 and included a review of historical data, interviews, and a site reconnaissance (Engineering-Science, 1994). A Site Investigation (SI) conducted in 1995 included soil sampling and installation and sampling of a groundwater monitoring well (Rust, 1996). Subsequently, an RFI was conducted which included a Human Health and Ecological Risk Evaluation. The results are provided in the *RCRA Facility Investigation/Interim Corrective Measures (RFI/ICM) Report for Site DP-84, Eglin AFB* (CH2M HILL, 1999).

The following is a list of the principal historical documents for Site DP-84, which are available for public review at the locations provided in the last section of this SB:

- *Investigation of Areas-of-Concern Final Report, Jack Lake Limb Disposal Area, Eglin AFB* (Engineering-Science, 1994)
- *Site Investigation Report, Area of Concern No. 69, Jack Lake Limb Disposal Area, Eglin AFB, Florida* (Rust, 1996)
- *RCRA Facility Investigation/Interim Removal Action (RFI/IRA) Work Plan, Jack Lake Limb Disposal Area, IRP Site DP-84* (Rust, 1997)
- *RCRA Facility Investigation/Interim Corrective Measures (RFI/ICM) Work Plan Addendum for Site DP-84, Eglin AFB* (CH2M HILL, 1998)
- *RCRA Facility Investigation/Interim Corrective Measures (RFI/ICM) Report for Site DP-84, Eglin AFB* (CH2M HILL, 1999)

As discussed in the RFI, Site DP-84 is an inactive surface disposal site covering an area approximately 800 feet by 800 feet, adjacent to Jack Lake. On the western portion of the site, a bermed disposal area covers approximately 400 feet by 200 feet of the site (Figure 2). The elevation at Site DP-84 is approximately 15 feet above mean sea level at the northwest corner of the site. The elevation drops off to sea level at the surface water in Jack Lake.

Wetlands surround the shoreline of Jack Lake. The site topography varies in elevation due to the disturbed areas where debris piles remain.

The disposal area originated as an unauthorized dumpsite; therefore, the age of the disposal site is unknown. In 1991, a guard was posted for access control, and accepted waste was limited to vegetative debris. Scrap wood, plastic wastes, tires, concrete fragments, and construction debris were observed onsite.

The site is located in a cleared area surrounded by an extensive scrub forest and is a recreational area of Eglin Main Base. Access to Site DP-84 is restricted by a locked gate; however, the site is occasionally used for horseback riding. Fishing is permitted in Jack Lake, but hunting is prohibited in this area. The land-use category for Site DP-84 is open space, according to the Land Use Plan (Eglin AFB, 1996). No changes in land use are currently proposed in the vicinity of the site.

The depth to the Sand-and-Gravel Aquifer at Site DP-84 is approximately 1 to 6 feet bls. FDEP defines the G-II aquifer as suitable for potable water use such that the groundwater has a total dissolved solids (TDS) content of less than 10,000 milligrams per liter (mg/L) (FDEP Rule 62-520.410, Florida Administrative Code). Geologic literature indicates that the top of the underlying Pensacola Clay is generally found between 75 and 100 feet bls in the vicinity of Site DP-84 (Hayes and Barr, 1983). The Pensacola Clay confining unit is approximately 290 feet thick beneath Site DP-84. A drinking water well is located approximately 0.3 mile northeast of Site DP-84, within Building No. 1750. Water well No. 111 is completed at a depth of 540 feet bls and supplies water to the Eglin horse stables.

At Site DP-84, groundwater flows to the southeast. Storm water drainage is generally to the east and southeast across the sparsely vegetated area toward Jack Lake, which borders the site to the east and south. The sandy soils on and around Site DP-84 allow the rainfall to readily percolate into the ground before the storm water leaves the immediate area. Jack Lake discharges via a small creek into Choctawhatchee Bay.

## Contaminant Assessment Results

The RFI included installation, sampling, and analyses of soil borings and monitoring wells, sampling and analyses of surface water and sediments, aquifer testing, and surveying. The following is a summary of the contaminants of potential concern (COPCs) identified during the RFI at Site DP-84:

<b><i>Surface Soils:</i></b>	Aroclor-1260; Arsenic
<b><i>Subsurface Soils:</i></b>	Aroclor-1260
<b><i>Groundwater:</i></b>	Manganese
<b><i>Surface Water:</i></b>	None
<b><i>Sediment:</i></b>	DDE

DDE was the only COPC identified in sediment. DDE is not related to any other COPCs identified during the Site DP-84 RFI and will therefore be evaluated in a separate investigation of Jack Lake, which is being conducted by Eglin AFB.

The Tier I screening level for manganese is a secondary drinking water standard, based on taste and odor. The RFI findings did not confirm that a release of manganese to groundwater occurred at the site; therefore, manganese in groundwater may be naturally occurring and is not considered to be a risk driver.

Risk driver contaminants are summarized in Table 1, along with their associated screening criteria and references.

**TABLE 1**  
Summary of Risk Driver Contaminants  
*Site DP-84, Eglin AFB*

Media	Contaminant	Maximum Detected (mg/kg)	Total Number of Samples	Number of Samples Exceeding Screening Level	Tier I Screening Level (mg/kg)
Surface Soil (0-2 ft bls)	Aroclor-1260	8,500	74	17 <sup>a</sup>	1.6
Subsurface Soil (>2 ft bls)	Aroclor-1260	3,400	55	1	44

**NOTES:**

Data and screening criteria are from Installation Restoration Program RCRA Facility Investigation

<sup>a</sup>Includes two surface soil samples collected during the SI

mg/kg = milligrams per kilogram

bls = below land surface

Aroclor-1260 [a polychlorinated biphenyl (PCB)] was detected in both surface and subsurface soils in a localized area. Aroclor-1260 was most prevalent in the surface soils (0 - 2 feet bls). The depth to groundwater in the impacted area of Site DP-84 ranges from 1 to 4 feet bls.

## Interim Corrective Measure

On January 4 -19, 1999, an Interim Corrective Measure (ICM) was conducted at Site DP-84 to remove PCB-contaminated soil identified during the RFI. The ICM consisted of removing approximately 491 tons of PCB-contaminated soil. The potential for additional PCB releases at Site DP-84 was eliminated in 1991, when unmonitored dumping in the landfill was discontinued. The impacted soil, removed during the ICM, reduced a potential secondary source of PCB contamination.

Cleanup goals for the removal of PCB-contaminated soil at Site DP-84 were established in conjunction with the Eglin AFB Partnering Team, which includes representatives from the EPA and FDEP. The soil cleanup goals established for Site DP-84 at the July 1998 Eglin AFB Partnering Meeting are summarized in Table 2.

**TABLE 2**  
Soil Cleanup Goals  
*Site DP-84, Eglin AFB*

	Depth (ft bls)	Aroclor-1260 Cleanup Goal (mg/kg)
Surface Soil	0-2	3.5
Subsurface Soil	At or greater than 2	44

The cleanup goals are risk-based media-specific concentrations (MSC) that are intended to protect human health and the environment. Access to Site DP-84 is restricted by a locked gate; however, the site is occasionally used for horseback riding. The site is closed, and exposure by military and maintenance personnel is very limited. Because of the limited direct exposure, the FDEP industrial soil criteria for PCBs of 3.5 mg/kg was established as the cleanup goal for surface soils (0 to 2 ft bls) at Site DP-84.

Soil leachability is a potential indirect exposure pathway for contaminant migration from subsurface soils to groundwater. PCBs were not detected above the Federal or Florida maximum contaminant level (MCL) of 0.5 microgram per liter ( $\mu\text{g/L}$ ) in any of the monitoring wells sampled during the RFI or the SI. To limit future migration of PCBs to the groundwater, the FDEP leachability criteria for PCBs of 44 mg/kg was established as the cleanup goal for subsurface soils (at or greater than 2 ft bls) at Site DP-84. Although the leachability criterion subsequently changed to 17 mg/kg upon application of Chapter 62-777, Florida Administrative Code, the 44 mg/kg soluble threshold limit concentration (STLC) was the appropriate criterion at the time of the interim measure.

Confirmatory soil samples were collected along the perimeter and floor of the 2-foot excavation area and along the perimeter of the 4-foot excavation area. The confirmatory samples were sent to a fixed-based laboratory for analysis to confirm that the soils remaining after excavation met the cleanup goals. Results of confirmatory soil samples indicate that the average Aroclor 1260 concentration remaining in subsurface soils at Site DP-84 is 3.25 mg/kg, well below the current leachability criterion of 17 mg/kg. The excavation was backfilled with clean fill material.

## Proposed Remedy

The RFI/CMS recommended No Further Investigation Required coupled with LUCs for Site DP-84. Future land use is not expected to deviate substantially from current land use. Should a change in current land use be required, it will be managed in accordance with the LUCAP and the LUCIP.

This remedy complies with each of the standards presented in EPA's RCRA Corrective Action Plan (U.S. EPA, 1994) as follows:

- *Protect human health and the environment.* The corrective action remedy is protective of human health and the environment with reference to the Human Health and Ecological Risk Evaluation located in the *RCRA Facility Investigation/Interim Corrective Measures (RFI/ICM) Report for Site DP-84, Eglin AFB* (CH2M HILL, 1999). The remedy will achieve

the media cleanup standards that are based on industrial exposure and leachability criteria.

- *Attain media cleanup standards set by implementing agency.* The media cleanup standards were identified in Florida and Federal regulatory guidance and rules, and selected by the AFB Partnering Team which includes representatives from the AF, EPA and FDEP.
- *Control the source of releases so as to reduce or eliminate, to the extent practicable, further releases that may pose a threat to human health and the environment.* The potential for additional PCB releases at Site DP-84 was eliminated in 1991, when unmonitored dumping in the landfill was discontinued. The impacted soil, removed during the ICM, reduced a potential secondary source of PCB contamination.
- *Comply with any applicable standards for management of wastes.* The ICM activities at Site DP-84 complied with the applicable standards for management of wastes. Excavated soils with PCB concentrations exceeding 50 mg/kg, regulated under the Toxic Substances Control Act (TSCA), were disposed of at the Chemical Waste Management Subtitle C landfill located in Emelle, Alabama. Soils with PCB concentrations less than 50 mg/kg and were disposed of at a Subtitle D landfill located in Graceville, Florida.
- *Other factors.* The determination of the proposed remedy also took into account other factors noted in U.S. EPA (1994), including Technical Feasibility, Costs, Long Term Effectiveness and Permanence, Short Term Effectiveness and Community Acceptance.

No residential use of the property will be allowed without the proper engineering controls. Depending on the location, nature, and intensity of potential future land use activities, the Air Force will conduct additional site investigation and assessment activities to determine the proper engineering controls if existing information is not adequate. The following sections summarize the findings supporting the proposed remedy and outline the proposed LUCs and their implementation.

## Nature of Contaminants

Contaminants were not detected in groundwater beneath the site or surface water from Jack Lake.

Average and maximum values of Aroclor-1260 remaining after excavation were calculated in the surface soil. A total of 50 surface soil samples were used in calculating a sitewide average of 0.83 mg/kg. The maximum concentration on Aroclor-1260 remaining in soils from less than 2 feet bls is 2.8 mg/kg. The 50 samples included surface soil results from the RFI and ICM confirmatory sampling, excluding those locations excavated during the ICM. To be conservative, the detection limits for all non-detects (U) were used in calculating the average.

The highest Aroclor-1260 concentration remaining in subsurface soil is 29 mg/kg. The average value, from confirmatory sampling for subsurface soils, is 3.25 mg/kg. Both values are well below the requisite 44 mg/kg. Confirmatory sampling results are summarized in the RFI/ICM report.

## Human Health Risk Assessment

Because of the limited exposure pathways, the risk evaluation focuses on the PCB remaining in the soils after the ICM was completed. The PCB surface soil and subsurface soil clean up goals of 3.5 and 44 mg/kg, respectively, were evaluated for protection of human and ecological receptors.

The potential direct pathways of exposure to COPCs in soil are by direct contact with COPCs in surface soil by ingestion, inhalation of fugitive dusts, and dermal absorption. Potential onsite human receptors may include military personnel, on training exercises, and recreational users, horseback riding, who could be directly exposed to surface soils through incidental ingestion, inhalation, and dermal contact. Future potential receptors would also include military personnel on training exercises and recreational users. Because the site is inactive, there is no routine site maintenance. Routes of direct exposure for maintenance workers would be the same as for the military personnel.

Because of the limited direct exposure, the industrial soil criteria for PCBs of 3.5 mg/kg was established as the cleanup goal for surface soils (0 to 2 feet bls) at Site DP-84. The removal of surface soils from the PCB-impacted area at Site DP-84 reduced the human health risk at the site to acceptable levels under the limited exposure scenario of an industrial site. The industrial soil cleanup level is also protective of recreational use, such as horseback riding. To estimate exposure for an adolescent who rides horses 5 days a week, it was assumed that 10% of the adolescent's intake is associated with horseback riding and the exposure duration is 10 years as opposed to 25 years for a worker. Based on these values, the exposure would be estimated at approximately 5% of the default level for an industrial worker; therefore, the industrial cleanup level is protective of this receptor (O'Brien & Gere, 1998).

Aroclor-1260 has not been detected in the groundwater beneath Site DP-84. Soil leachability is a potential indirect exposure pathway for contaminant migration from subsurface soils to groundwater. Results of confirmatory soil samples, collected following the ICM, indicate that the average Aroclor 1260 concentration in subsurface soils is 3.25 mg/kg, well below the current leachability criterion of 17 mg/kg. Removal of soils exceeding the leachability criteria provided additional protection of the groundwater from future migration of PCBs.

## Ecological Risk Assessment

An ecological risk evaluation of Aroclor-1260 in surface soil was developed for Site DP-84 to evaluate whether residual Aroclor-1260 remaining after the ICM poses a threat to ecological receptors.

A conservative evaluation of potential risk to terrestrial plants, small mammals, and birds indicated that adverse effects are unlikely with plants, but may occur with mammals and birds. However, given the conservativeness of the wildlife exposure model and the minimal extent of surface soil detections, it is also unlikely that Aroclor-1260 would pose significant adverse ecological effects to terrestrial wildlife at this site.

Based on the consideration of area use by the target receptors as well as other modeling uncertainties, the potential for adverse effects on terrestrial mammals and birds at this site are low.



## Proposed Remedy Implementation

Site DP-84 has been recommended for No Further Investigation Required coupled with land use controls. The land use controls will consist of the following measures:

- The property will be restricted from residential development without proper engineering controls. Depending on the location, nature, and intensity of potential future land use activities, the Air Force will conduct additional site investigation and assessment activities to determine the proper engineering controls if existing information is not adequate.
- The property will be inspected at least quarterly to ensure that unauthorized use of the property does not occur and that status of the property is unchanged. The Air Force will submit an annual site status report to both the EPA and FDEP, in accordance with the mutually approved LUCAP.
- The Air Force will notify EPA and FDEP immediately upon the discovery of any unauthorized change in land use.
- For requests for major land use changes, written requests will be submitted to both the EPA and FDEP, in accordance with the mutually approved LUCAP. Requests will be submitted at least sixty days (except in emergency situations) prior to implementation of any major change in land usage.

A LUCIP will be developed to document the implementation of these LUCs. In addition, the LUCIP will designate an Eglin Environmental Management Restoration (EMR) representative to be responsible for compliance with the LUCs, and the LUCIP will be referenced in appropriate Eglin AFB planning documents. Further, if land use changes are required, the LUCIP and the LUCAP will address how the LUCs or remedy will be changed, if necessary.

By separate MOA with EPA and FDEP, dated December 23, 1999, Eglin AFB, on behalf of the Department of the Air Force, agreed to implement base-wide, certain periodic site inspection, condition certification, and agency notification procedures designed to ensure the maintenance by Installation personnel of any site-specific LUCs deemed necessary for future protection of human health and the environment. A fundamental premise underlying execution of that agreement was that through the Air Force's substantial good-faith compliance with the procedures called for therein, reasonable assurances would be provided to EPA and FDEP as to the permanency of those remedies which included the use of specific LUCs.

Although the terms and conditions of the MOA are not specifically incorporated or made enforceable herein by reference, it is understood and agreed by the Air Force, EPA and FDEP that the contemplated permanence of the remedy reflected herein shall be dependent upon the Installation's substantial good faith compliance with the specific LUC maintenance commitments reflected therein. Should such compliance not occur or should the MOA be terminated, it is understood that the protectiveness of the remedy concurred on may be reconsidered and that additional measures may need to be taken to adequately ensure necessary future protection on human health and the environment.

## Public Participation for DP-84

The public is encouraged to provide comments regarding the corrective action alternatives provided in this SB or any other remedial alternatives, including those not previously studied. The public can review information on the IRP at Eglin AFB and the investigations and actions taken under the Permit, including all reports and documents. The information repository and administrative record files are available at the following locations:

Eglin Air Force Base AAC/EMR  
207 N. Second Street, Bldg. 216  
Eglin AFB, FL 32542-5133

Technical Library  
203 W. Eglin Blvd, Suite 300  
Eglin AFB, FL 32542-5429

FDEP  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

A 45-day public comment period will be held from September 1, 2000 to October 15, 2000. Comments received will be summarized, and responses will be provided in the upcoming Responses to Comments document. The Responses to Comments document will be prepared following the close of the public comment period. The Responses to Comments will be included with the Draft permit modification. If requested during the Public Comment Period, EPA will hold a public meeting to respond to any oral comments or questions regarding this action. The public will be notified of the date, time, and place of any public hearing as soon as it is scheduled.

To request a hearing or provide comments for Site DP-84, contact the following person in writing postmarked by October 15, 2000:

EPA – Region 4  
Federal Facilities Branch  
61 Forsyth Street  
Atlanta, GA 30303  
Attention: Mr. Jon Johnston, Chief

To request further information, you may contact one of the following people:

Mr. Howard H. Mathews III, R.E.M.  
Eglin AFB  
207 N. 2<sup>nd</sup> Street, Bldg 216  
Eglin AFB, FL 32542-5133  
(850) 882-7791

Mr. Robert H. Pope  
EPA – Region 4  
Federal Facilities Branch  
61 Forsyth Street  
Atlanta, GA 30303  
(404) 562-8506

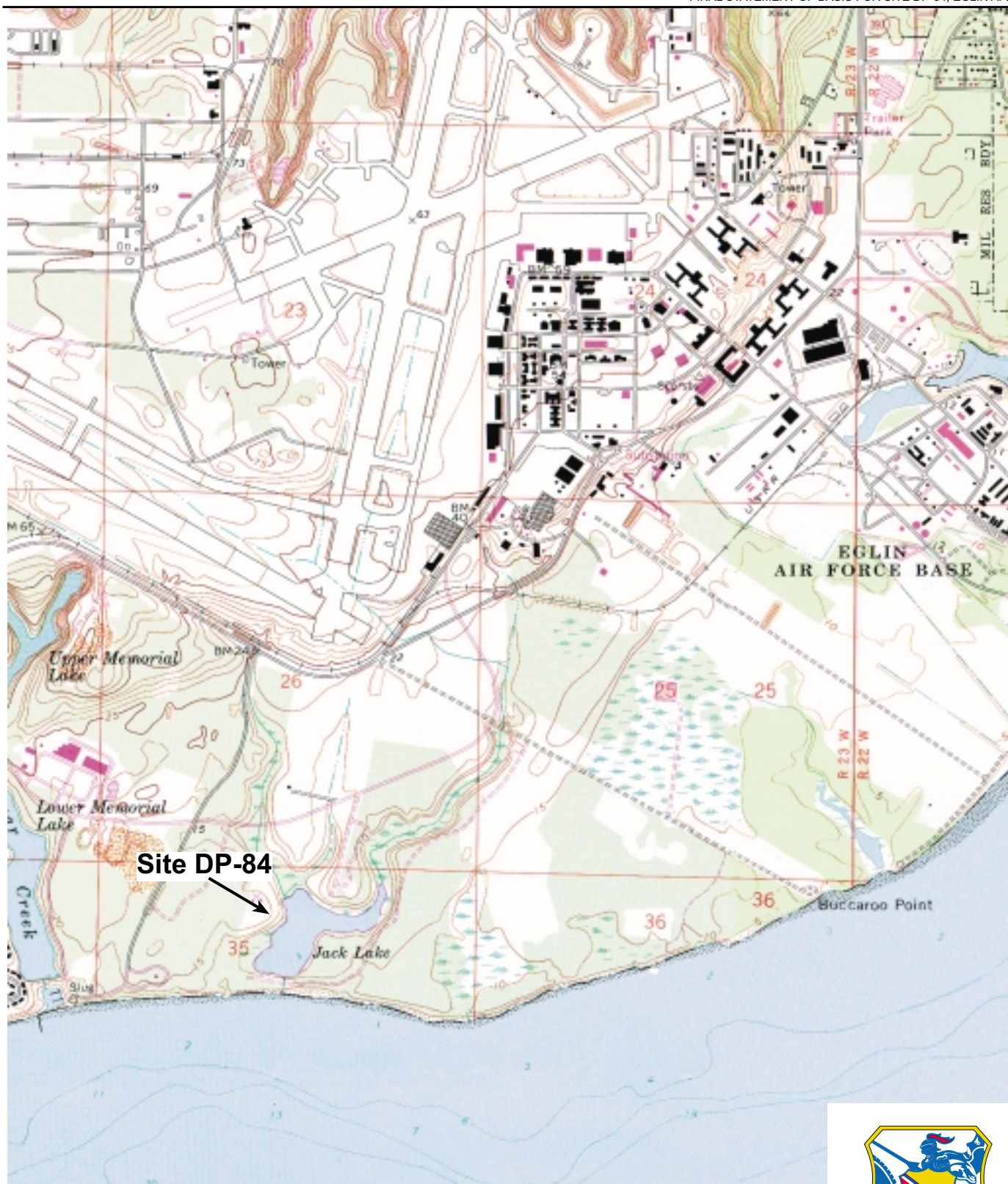
Mr. Greg Brown, P.E.  
FDEP  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400  
(850) 921-6779

## Important Dates to Remember

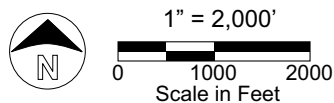
Public Comment period begins: **September 1, 2000**

Public Comment period ends: **October 15, 2000**

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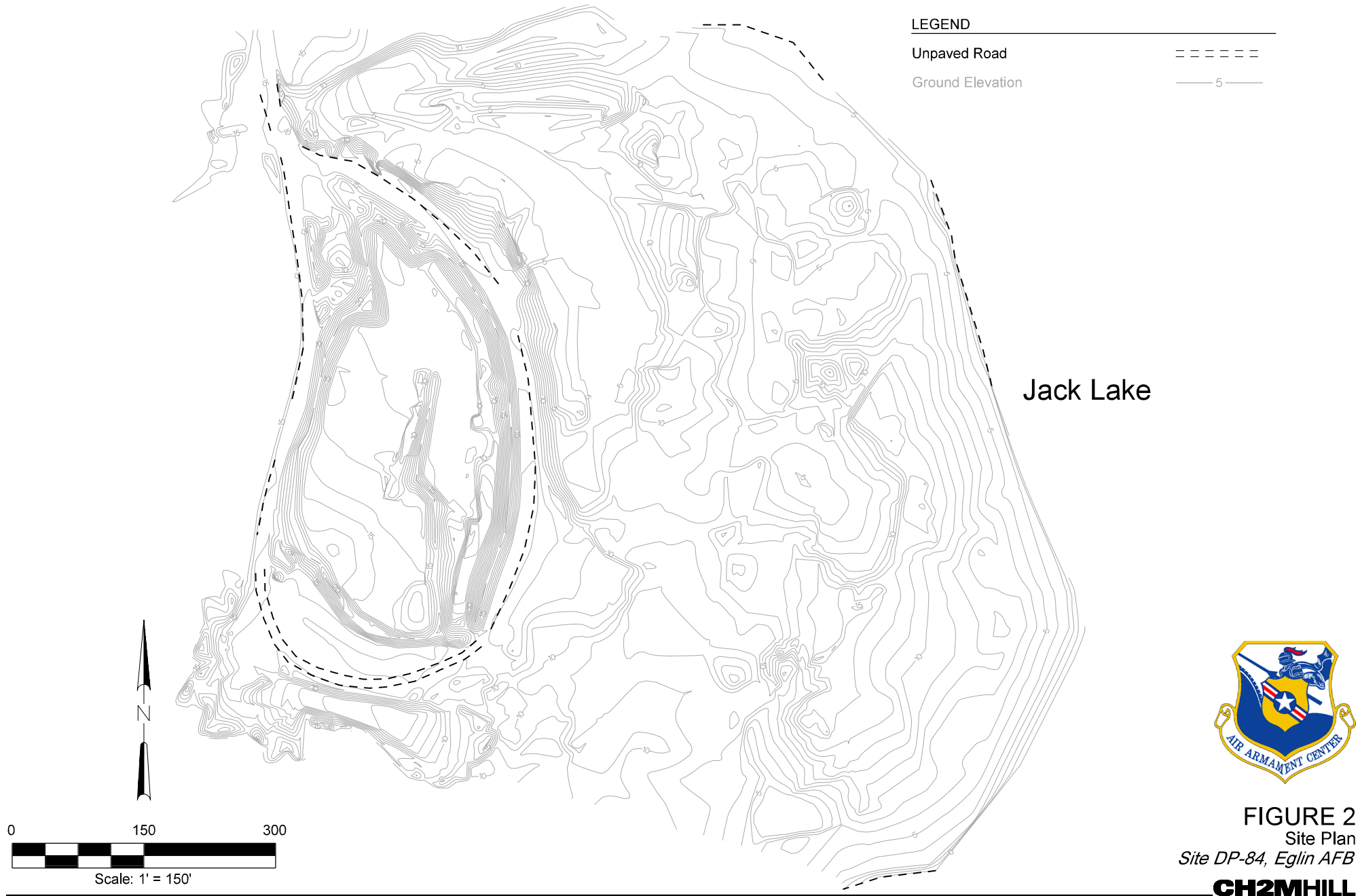


Source: USGS Quadrangles, Fort Walton Beach, FL, 1992; Destin, FL, 1976.



**FIGURE 1**  
Topographic Map  
Site DP-84, Eglin AFB

**CH2MHILL**





# Applicable Definitions

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**Aquifer:** Subsurface rock or sediment in a formation that is saturated and sufficiently permeable to yield economic quantities of water to wells and springs.

**Contaminants of Potential Concern (COPC):** contaminants that represent an actual or potential threat to human health or the environment.

**Corrective Measures Implementation Plan (CMIP):** Document outlining remedy implementation including the remedy design, construction and operation and maintenance.

**Downgradient:** In the direction of groundwater flow.

**Facility:** Refers to a military base or other entire federal installation, whereas the term site refers to a particular area (such as an operable unit) making up only a portion of the facility.

**Florida Department of Environmental Protection (FDEP):** Regulatory branch in Florida responsible for implementing state or federal environmental laws.

**Groundwater:** The supply of fresh water found beneath the Earth's surface, usually in aquifers, which supply wells and springs.

**Hazardous and Solid Waste Amendment (HSWA) of 1984:** Amendment to RCRA significantly expanded the scope and requirements of RCRA at active facilities.

**Installation Restoration Program (IRP):** The Air Force program designed to identify, investigate, and cleanup contamination associated with past Air Force activities at active AF installations;

government-owned, contractor-operated facilities; off-site locations where contamination may have migrated; third party sites; and sites that the AF formerly owned or used.

**Land Use Control Assurance Plan (LUCAP):** A Memorandum of Agreement (MOA) among Eglin, EPA, and FDEP designed to assure the effectiveness and reliability of the required Land Use Controls (LUCs) for as long as any LUC continues to be required in order for the remedial/corrective action to remain protective.

**Land Use Control (LUC):** is broadly interpreted to mean any restriction or control, arising from the need to protect human health and the environment, that limits use of and/or exposure to any portion of that property, including water resources. This term encompasses institutional controls, such as those involving real estate interests, governmental permitting, zoning, public advisories, deed notices, and other legal restrictions. The term may also include restrictions on access, whether achieved by means of engineered barriers such as a fence or concrete pad, or by human means, such as the presence of security guards. Additionally, the term may involve both affirmative measures to achieve the desired restriction (e.g., night lighting of an area) and prohibitive directives (no drilling of drinking water wells). Considered altogether, the LUCs for a facility, in conjunction with the base master plan, will provide a blueprint for how its property should be used in order to maintain the level of protectiveness

which one or more remedial/corrective actions were designed to achieve.

**LUC Implementation Plan (LUCIP):** A written plan, normally developed after a decision document has required one or more LUCs, for some particular area (operable unit, contaminated unit, and/or solid waste management unit). The LUCIP 1) identifies each LUC objective for that area (e.g., to restrict public access to the area for recreational use) and 2) specifies those actions required to achieve each identified objective (e.g., install/maintain a fence, post warning signs, record notice in deed records). LUCIPs specify what must be done to impose and maintain the required LUCs, and are therefore analogous to design and/or operation and maintenance plans developed for active remedies.

**Memorandum of Agreement (MOA) on Land Use Controls:** Agreement between the EPA, FDEP and Eglin AFB outlining the process and procedures used to implement and maintain Land Use Controls.

**Milligrams per liter (mg/L):** Unit of measure used to express concentrations in fluids.

**National Oil and Hazardous Substances Pollution Contingency Plan (NCP):** The NCP establishes procedures and standards for responding to releases of hazardous substances, pollutants and contaminants.

**Permit:** A RCRA permit, issued for the Eglin AFB, establishes the facility's operating conditions for managing hazardous waste.

**Potable Water:** Water that is safe for drinking and cooking.

**RCRA Facility Investigation (RFI):** Evaluates the nature and extent of the releases of hazardous waste.

**Resource Conservation and Recovery Act (RCRA) of 1976** requires each hazardous waste treatment, storage, and disposal facility to manage hazardous waste in accordance with a permit issued by the U.S. Environmental Protection Agency (EPA) or a state agency that has a hazardous waste program approved by EPA.

**Site Investigation (SI):** Physical inspection of a potential IRP site that may include limited soil and water sampling. Used to confirm results of PA or support of a site that does not present an environmental hazard.

**Solid Waste Management Unit (SWMU):** Any discernible unit (to include regulated units) at which RCRA solid waste have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste.

**Statement of Basis (SB):** The RCRA decision document that specifies the site remedy and establishes LUCs.

**Upgradient:** In the direction from which groundwater is flowing.

**U.S. Environmental Protection Agency (EPA):** The federal agency responsible for implementing environmental laws enacted by Congress.